1 2 3 4 5	Daniel Werner (admitted pro hac vice) RADFORD & KEEBAUGH, LLC 315 W. Ponce de Leon Ave, Suite 1080 Decatur, GA 30030 Telephone: (678)271-0300 Facsimile: (678)271-0314 Email: dan@decaturlegal.com Attorney for Plaintiffs UNITED STATES	DISTRICT COURT
7	DISTRICT OF ARIZONA	
8	Lilian Fuentes-Ortega, on her own behalf and on behalf of her minor children, H.Y.L.F. and B.M.L.F.,	Case No.: CV-22-00449-PHX-DGC
10	Plaintiffs,	NOTICE OF DEPOSITION
11	vs.	
12	United States of America,	
13	Defendant	
14	NOTICE IS HEREBY GIVEN that, pursuant to Fed. RR. Civ. P. 26 and 30, Plaintiff	
15	Lilian Fuentes-Ortega, on her own behalf and on behalf of her minor children, H.Y.L.F. and	
16	B.M.L.F., will take the oral deposition of Carl E. Landrum by stenographic and audio/video-	
17		
18	•	, 021 320 10320 11328 33300, 33 3220 11320 11320 11320
19	place:	
20	PERSON TO BE EXAMINED:	Carl E. Landrum
21	DATE OF DEPOSITION:	On such date as mutually agreed by the parties or, absent such agreement,
22		October 17, 2023
23	TIME OF DEPOSITION:	9:30 a.m. (Arizona)
24		
25		
26		

1	PLACE OF DEPOSITION:	Office of the U.S. Attorney Two Renaissance Square	
2		40 North Central Avenue, Suite 1800 Phoenix, Arizona 85004	
3		and virtually via Zoom meeting (Instructions for virtual attendance via Zoom will be provided prior to deposition)	
4			
5	COURT REPORTER:	Name to be provided sufficiently in advance of the deposition to allow timely objections, if	
6		any.	
8	Pursuant to Federal Rules of Civil Procedure 30(b)(2) and 34, you are further instructed		
9	to provide undersigned counsel with a copy of all documents, materials, and/or things reviewed		
10	in preparation for your deposition at least one (1) day prior to your deposition.		
11	Please note, this deposition will be conducted via Zoom Conferencing. A		
12	computer/laptop with a webcam is necessary and each party will need to download the Zoom		
13	app to access the deposition remotely. You will receive an email prior to the date of the		
1415	deposition with the Zoom link to join the deposition.		
16	RAD	FORD & KEEBAUGH, LLC	
17	<u>/s/ D</u>	aniel Werner	
18		el Werner (<i>pro hac vice</i>) rney for Plaintiffs	
19			
20			
21			
22			
23			
24			
25			
26			

CERTIFICATE OF SERVICE This is to certify that on August 30, 2023, I electronically filed the attached document with the Clerk of Court using the CM/ECF system, which sent notification of such filing to all counsel of record. /s/ Daniel Werner Daniel Werner Attorney for Plaintiffs